

UNDER SEAL

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**UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
PORTLAND DIVISION**

UNITED STATES OF AMERICA

3:20-cr- 00520-SI

v.

INDICTMENT

**MISTY MAY GAMBLE, and
ABRAN RAYA LEON,**

**18 U.S.C. §§ 1028(a)(7), 1028A, 1344,
1704, 1708**

Defendants.

UNDER SEAL

THE GRAND JURY CHARGES:

**COUNT 1
(Bank Fraud)
(18 U.S.C. § 1344)**

1. At all times relevant to this Indictment, CitiBank was a financial institution as defined by 18 U.S.C. § 20.
2. On or about September 6, 2020, in the District of Oregon, defendant **MISTY MAY GAMBLE** knowingly devised and intended to devise a material scheme to defraud CitiBank and to obtain money, funds, and property owned by or under the custody and control of CitiBank by material false and fraudulent pretenses, representations, and promises.
3. It was part of the scheme to defraud that defendant **MISTY MAY GAMBLE** fraudulently obtained a CitiBank-issued credit card ending in the numbers X4624, in order to use the stolen credit card to make purchases without legal authorization or knowledge of the account holder, AV-1.

4. On or about September 6, 2020, in the District of Oregon, defendant **MISTY MAY GAMBLE**, for purposes of executing and attempting to execute the above-described scheme and artifice to defraud CitiBank, and for obtaining money, funds, or property owned by or under the custody and control of CitiBank, by means of material false or fraudulent pretenses, representations, or promises knowingly and fraudulently purchased various items at various locations around the Portland metropolitan area, using the stolen bank-issued credit card ending in the numbers X4624.

All in violation of Title 18, United States Code, Section 1344.

COUNT 2
(Aggravated Identity Theft)
(18 .S.C. § 1028A)

All prior paragraphs of this Indictment are incorporated herein.

5. On or about September 6, 2020, in the District of Oregon, defendant **MISTY MAY GAMBLE** did unlawfully, knowingly, and intentionally transfer, possess, and use, without lawful authority, a means of identification of another, to wit: a name and credit card number of AV1, knowing that the means of identification belonged to a real person, during and in relation to Bank Fraud in violation of 18 U.S.C. § 1344.

All in violation of Title 18, United States Code, Section 1028A.

COUNT 3
(Possession of Counterfeit Postal Service Arrow Keys)
(18 U.S.C. § 1704)

6. On or about September 24, 2020, in the District of Oregon, defendants **MISTY MAY GAMBLE** and **ABRAN RAYA LEON** knowingly possessed with the intent to unlawfully and improperly use, and to cause the same to be unlawfully and improperly used, a

key suited to a lock adopted and in use by the United States Post Office Department and Postal

Service, and to any authorized receptacle for the deposit of mail matter, namely, a counterfeit Postal Service “arrow” key.

All in violation of Title 18, United States Code, Section 1704.

COUNT 4
(Possession of Stolen Mail)
(18 U.S.C. § 1708)

7. On or about September 24, 2020, in the District of Oregon, defendants **MISTY MAY GAMBLE** and **ABRAN RAYA LEON** did unlawfully possess approximately 240 pieces of mail, which had been stolen from West Linn, Oregon, knowing the mail had been stolen.

All in violation of Title 18, United States Code, Section 1708.

COUNT 5
(Identity Theft)
(18 U.S.C. § 1028(a)(7))

8. On or about September 24, 2020, in the District of Oregon, defendant **MISTY MAY GAMBLE** did knowingly possess or use, without lawful authority, a means of identification of another person in connection with an unlawful activity that constitutes a violation of Federal law, to wit: possession of stolen mail.

All in violation of Title 18, United States Code, Section 1028(a)(7).

FORFEITURE ALLEGATION

9. Upon conviction of the offense alleged in Count 1 of this Indictment, defendant **MISTY MAY GAMBLE** shall forfeit to the United States, pursuant to 18 U.S.C. § 982(a)(2)(A), any property constituting, or derived from, proceeds defendant obtained directly or

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indirectly as a result of the offense, including but not limited to a sum of money equal to the amount of proceeds obtained as a result of the offense in the form of a money judgment.

Dated: November 10, 2020


A TRUE BILL.



OFFICIATING FOREPERSON

Presented by:

BILLY J. WILLIAMS
United States Attorney



CLAIRE M. FAY, DCB # 358298
Assistant United States Attorney